

Case #: 1:25-cv-00410-JLS

Amended Complaint

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF NEW YORK

David Davon Adams,

Plaintiff,

v.

Credit Acceptance Corporation,

TransUnion, LLC,

Experian Information Solutions, Inc.,

Equifax Information Services, LLC,

LVNV Funding, LLC,

Self Financial, Inc.,

Regional Acceptance Corporation

Defendants.



FIRST AMENDED VERIFIED COMPLAINT

Plaintiff, David Davon Adams, appearing pro se, hereby files this First Amended Verified Complaint pursuant to Federal Rule of Civil Procedure 15(a)(1)(A), and alleges as follows:

[All prior allegations from the original Verified Complaint are incorporated herein by reference.]

This Amended Complaint adds Regional Acceptance Corporation as a named Defendant.

ADDITIONAL ALLEGATIONS AGAINST REGIONAL ACCEPTANCE CORPORATION

1. Plaintiff includes Regional Acceptance Corporation as a Defendant based on its continued reporting of inaccurate, inconsistent, and unverifiable information regarding a prior auto loan allegedly associated with Plaintiff.
2. Regional Acceptance has reported false balances, inconsistent account dates, and failed to correct inaccuracies after Plaintiff submitted formal written disputes to all three major

credit bureaus and to Regional directly.

3. Regional Acceptance failed to perform a reasonable investigation in violation of the Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681s-2(b), and continued to furnish knowingly false data.

4. Plaintiff suffered reputational damage, credit denials, elevated interest rates, and emotional distress as a result.

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in his favor against all Defendants, including Regional Acceptance Corporation, for statutory, actual, and punitive damages, as well as for injunctive and declaratory relief, attorneys' fees (if later represented), and such other relief as the Court deems just.

Respectfully submitted,

David Davon Adams
Pro Se Plaintiff
916 Prospect Avenue
Buffalo, NY 14213
Phone: 716-555-1234

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

David D. Adams, Plaintiff, Pro Se

v.

Credit Acceptance Corporation,

LVNV Funding LLC,

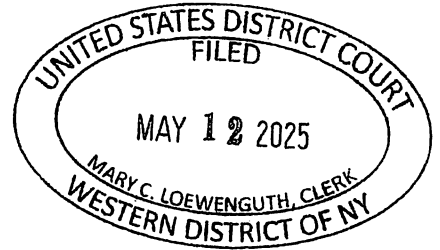
TransUnion LLC,

Experian Information Solutions, Inc.,

Equifax Information Services LLC,

Self Financial, Inc.

Defendants.



25 CV 410-JLS

**VERIFIED COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF**

JURY TRIAL DEMANDED

Plaintiff David D. Adams, proceeding pro se, brings this action for actual, statutory, and punitive damages under the Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681 et seq., the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692 et seq., New York General Business Law § 349, and state common law. Defendants engaged in a sustained pattern of willful, repeated, and egregious violations of federal and state law, including the knowing publication of false credit information and willful disregard for formal consumer disputes. Plaintiff seeks damages in the amount of \$100,000,000 and injunctive relief suppressing all inaccurate tradelines.

I. INTRODUCTION

Over a span of five years (2020–2025), Plaintiff submitted four documented rounds of certified disputes to the major credit reporting agencies and directly to furnishers, all of which were ignored or inadequately addressed. These violations resulted in sustained damage to Plaintiff's creditworthiness, repeated denials of credit, and financial losses.

II. JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1367. Venue is proper in the Western District of New York under 28 U.S.C. § 1391(b), as the events giving rise to these claims occurred in this district and Plaintiff resides here.

III. PARTIES

1. Plaintiff David D. Adams is a natural person residing at 916 Prospect Ave, Buffalo, NY 14213.
2. Defendant Credit Acceptance Corporation is a Michigan-based furnisher of consumer credit data with a principal place of business at: 25505 W. Twelve Mile Road, Suite 3000, Southfield, MI 48034.

3. Defendant LVNV Funding LLC is a debt buyer headquartered at: 55 Beattie Place, Suite 110, Greenville, SC 29601.
4. Defendant TransUnion LLC is a nationwide consumer reporting agency with executive offices at: 555 W. Adams Street, Chicago, IL 60661.
5. Defendant Experian Information Solutions, Inc. is a consumer reporting agency with headquarters at: 475 Anton Boulevard, Costa Mesa, CA 92626.
6. Defendant Equifax Information Services LLC is a consumer reporting agency with a principal place of business at: 1550 Peachtree Street NE, Atlanta, GA 30309.
7. Defendant Self Financial, Inc. (formerly Self Lender, Inc.) is a Texas-based credit builder with a business address at: 901 E. 6th Street, Suite 400, Austin, TX 78702.

IV. FACTUAL BACKGROUND

8. Plaintiff submitted four rounds of certified mail disputes from 2020 through 2025: March 2020, November 2021, June 2023, and April 2025.
9. Plaintiff provided GAP insurance payout proof in 2020 but Credit Acceptance continued reporting a delinquency.
10. CFPB complaints were filed in 2020 (LVNV and Experian), 2023 (Self Financial), and 2025 (Self Financial unresolved account).
11. No agency or furnisher corrected the disputed data or performed a reasonable investigation.

V. CLAIMS FOR RELIEF

Count I – Violation of the FCRA (15 U.S.C. § 1681e(b)) – Failure to Ensure Accuracy

- TransUnion, Experian, and Equifax failed to ensure accuracy of disputed tradelines after certified disputes.

**Count II – Violation of the FCRA (15 U.S.C. § 1681i) –
Failure to Investigate**

- Each CRA failed to reinvestigate despite receiving proper documentation.

**Count III – Violation of the FCRA (15 U.S.C. § 1681s-2(b))
– Furnisher Obligations**

- Credit Acceptance, LVNV, and Self Financial failed to validate or correct their reporting.

**Count IV – Violation of the FDCPA (15 U.S.C. §§ 1692e and
1692g)**

- LVNV and Self Financial misrepresented debts and failed to validate upon dispute.

Count V – Violation of NY GBL § 349

- **All Defendants engaged in deceptive business practices by continuing to report inaccurate credit data.**

Count VI – Negligence

- **All Defendants failed to exercise reasonable care, resulting in financial and reputational harm.**

Count VII – Defamation

- **Each Defendant published false credit information despite repeated notice and documentation.**

Count VIII – Willful Violations (15 U.S.C. § 1681n)

- **Defendants acted in willful disregard of their duties under the FCRA and FDCPA.**

VI. DAMAGES AND PRAYER FOR RELIEF

Plaintiff seeks:

a. Actual, statutory, and punitive damages totaling \$100,000,000, justified by sustained harm over multiple years.

b. Permanent injunctive relief requiring suppression or deletion of all inaccurate tradelines, including:

- Credit Acceptance (post-GAP delinquency)**
 - LVNV Funding (unvalidated collection tradeline)**
 - Self Financial (false charge-off and derogatory reporting)**
- c. Recovery of all litigation costs and attorney fees (if applicable).**
- d. Any other relief the Court deems just and proper.**

VII. JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

VIII. ARBITRATION WAIVER AND PRESERVATION OF RIGHTS

Plaintiff objects to any attempt to compel arbitration and preserves the right to challenge the validity and enforceability of any such clause.

IX. VERIFICATION

Executed on: May 10, 2025

Respectfully submitted,

David D. Adams

916 Prospect Ave

Buffalo, NY 14213

davidadams2891@yahoo.com

(716) 435-6420

Pro Se Plaintiff – Federal Action Filed

Verification Statement:

I, David D. Adams, verify under penalty of perjury that the factual allegations in this complaint concerning the conduct of each defendant are true and correct to the best of my knowledge, including but not limited to:

- Credit Acceptance Corporation: knowingly reported a delinquency after GAP documentation and disputes.
- LVNV Funding LLC: failed to validate debts and continued reporting after multiple disputes.

- **TransUnion LLC: failed to correct multiple tradelines over several years.**
- **Experian: refused to suppress clearly invalid tradelines despite CFPB complaints.**
- **Equifax: ignored GAP proof and failed to reinvestigate.**
- **Self Financial, Inc.: misreported inflated charges and closed the account with derogatory marks despite disputes.**

A handwritten signature in black ink, appearing to read 'David D. Adams', with a stylized, sweeping flourish at the end.

David D. Adams

May 12, 2025

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

David D. Adams

(b) County of Residence of First Listed Plaintiff Erie
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

David D. Adams, Pro Se Buffalo, NY 142xx (716)
435-6420 davidadams2891@yahoo.com

DEFENDANTS

Credit Acceptance Corp, Experian Information Solutions,
TransUnion LLC. Equifax Inc.. LVNV Funding LLC. Self inc
County of Residence of First Listed Defendant Oakland (Michigan)
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

25 CV 410**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C. § 1681 et seq. (FCRA); 15 U.S.C. § 1692 et seq. (FDCPA)

VI. CAUSE OF ACTION

Brief description of cause:

Violation of Fair Credit Reporting Act and Fair Debt Collection Practices Act; willful misreporting, failure to investigate, and collection activity on disp.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
50,000,000

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

05/10/2025

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. (a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. **Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. **Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.